



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
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ATLANTA, GEORGIA 30303-8960

June 1, 2009

Dale A. Ditmanson, Superintendent
National Park Service
Great Smoky Mountains National Park
107 Park Headquarters Road
Gatlinburg, Tennessee 37738

SUBJECT: Final Environmental Impact Statement and General Management Plan
Amendment for the Elkmont Historic District, Great Smoky Mountains National
Park in Tennessee; CEQ Number 20090130

Dear Mr. Ditmanson:

The U.S. Environmental Protection Agency (EPA) has reviewed the referenced Final Environmental Impact Statement (EIS) and General Management Plan Amendment in accordance with its responsibilities under Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act. The purpose of the general management plan update and Final EIS is to present a plan for managing the Elkmont Historic District (Elkmont) of the Great Smoky Mountains National Park (GSMNP) in the vicinity of Gatlinburg, Tennessee. The National Park Service (NPS) is the lead federal agency for the proposed action.

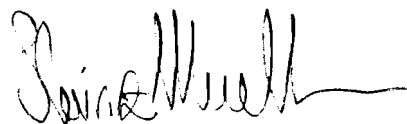
The NPS, with input from members of the public and consulting parties, identified issues related to future management of Elkmont. The primary concerns raised were cultural and natural resources management and visitor experience. In 1994, the Elkmont community was listed in the National Register of Historic Places as an historic district with 49 of the remaining 74 buildings contributing to the character of the district. Seven alternatives were developed to provide a full range of management options for Elkmont, including the no action alternative and six other alternatives that propose incrementally greater preservation and reuse of district buildings for a variety of purposes. Alternative C is identified as the NPS preferred alternative. Alternative C would restore the Appalachian Clubhouse for public rental and day use, as well as 18 other historic district buildings. The remaining buildings would be removed, and these areas restored with native plant communities and natural systems.

A number of mitigation measures are proposed in the Final EIS to avoid or minimize potentially adverse impacts from implementation of the new management plan and to ensure that the park's natural and cultural resources are protected and preserved for future visitors. EPA supports inclusion of these mitigation measures, particularly the use of pervious pavement for all parking areas and the use of buffer setbacks, as part of the revised general management plan to protect the Little River and its tributaries. EPA recommends that during ground disturbing activities, riparian corridors and buffer setbacks should be identified on maps or aerial photos

and clearly designated in the field with paint or flagging. EPA also recommends that these programs include monitoring activities to ensure that the increase in hardened access areas and likely subsequent increase in recreational and educational usage of the park do not negatively impact natural and cultural resources, particularly wastewater discharges to the Little River.

Based on our review of the Final EIS, EPA has no additional concerns related to this project. EPA recommends that all mitigation measures and monitoring programs, as described in the Final EIS and including the above recommendations, should be fully implemented. We appreciate the opportunity to review the proposed action. Please contact Ben West of my staff at (404) 562-9643 if you have any questions or want to discuss our comments further.

Sincerely,

A handwritten signature in black ink, appearing to read "Heinz J. Mueller", with a long horizontal flourish extending to the right.

Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management